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November 24, 1986

REPLY TO: Woodland Hills

John G. Peterson, Esq.  
PETERSON & BRYNAN  
8530 Wilshire Boulevard, Ste. 407  
Beverly Hills, CA 90211

Re: Church of Scientology of California v.  
Gerald Armstrong

Dear Mr. Peterson:

This letter will serve to confirm our telephone conversations of November 21, 1986, regarding various discovery matters. The following is a list of those matters which we discussed, as well as any agreements regarding the same:

1. The deposition of Dr. Singer, set for November 24, 1986, is off calendar. We contend that Dr. Singer is an expert witness in this case and that she is entitled to expert witness fees pursuant to her request. Because of your disagreement with our position, you will file a motion to compel her testimony as a percipient witness.
2. The deposition of Laurel Sullivan, set for November 24 and 25, 1986, is off calendar pursuant to your request. I advised you that I am available for the deposition on the scheduled dates.
3. The continued deposition of Kima Douglas is set for December 10, 1986, at 10:00 a.m. in Oakland. Mr. Bowles is to confirm the date and location of the deposition in a letter to me.
4. The deposition of Martin Samuels, presently set for December 3, 1986, will be rescheduled to a convenient date and time. I advised you that Mr. Samuels telephoned me after receiving a subpoena that had no deposition date indicated on it. Although the subpoena

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is invalid, Mr. Samuels is willing to make himself available for deposition.

5. I once again requested the records of Coastline Community College, the Los Angeles Police Department and the District Attorney or "Reiner" materials. You again represented that those would be provided to me.
6. I requested that I be provided with all documents used at the depositions of Mr. Armstrong's family in British Columbia. You advised me that you would look into the matter and get back to me.
7. I requested all records obtained from custodian of records depositions of the following individuals/entities: Dr. Roy I. Slakov, Chilliwack General Hospital, Chilliwack Senior Secondary School, and University of British Columbia. You advised me that you had not yet received copies of these documents, but would forward the same to me once they were received.
8. In connection with all of the depositions taken in British Columbia, I requested the name of the court reporting service from which I can obtain copies of the transcripts. You advised me that the name of the service would be provided to me.
9. I requested a copy of the videotape of the deposition of Phyllis Armstrong which you agreed to provide me at my expense.
10. Lastly, I requested that you review my letter of November 7, 1986, regarding two prior requests for production served on your client. You said the matter was presently under review and that you would discuss your position with me following the hearing on the motion to continue the trial on the cross-action set for November 24, 1986.

Very truly yours,

CONTOS & BUNCH

JULIA DRAGOJEVIC

JD:kk  
cc: Gerald Armstrong  
LTR4:25